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May 30, 2023

**VIA ECF**

The Honorable Gregory H. Woods, U.S.D.J.  
 U.S. District Court, Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

**MEMORANDUM ENDORSED**

Re: *Anacacy v. DRC Group, Inc. et al*  
**Case No.: 1:22-cv-04239-GHW**

Dear Honorable Judge Woods:

This law firm represents plaintiff Steve Anacacy (the "Plaintiff") in the above-referenced matter.

Pursuant to Your Honor's Individual Motion Practice Rule I(E), this letter respectfully serves to request a global extension of time of the briefing schedule on Defendant's motion to dismiss, as follows:

1. Plaintiffs' opposition to the motion to dismiss to be filed on or before June 28, 2023; and
2. Defendant's reply to the motion to dismiss to be filed on or before July 5, 2023.

This is the first request of its kind, and is made on consent of Defendants Beverage Container Recycling Corporation, DRC Group, Inc., Alex Doljansky, and Gard Recycling, Inc., (collectively, the "Defendants").

The basis of this request is that the undersigned will be traveling overseas from June 1, 2023, to, through and including, June 17, 2023, and will have extremely limited availability during this time.

We thank the Court for its attention to this matter, and are available at the Court's convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.


By: /s/ Jason Mizrahi  
 Jason Mizrahi  
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Application denied. At the April 13, 2023 conference, the Court -- with counsel present -- set a briefing schedule for Defendant's anticipated motion. Dkt. No. 50. This letter does not identify sufficient cause for deviating from that schedule.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 53.

SO ORDERED.

Date: May 31, 2023

  
 GREGORY H. WOODS  
 United States District Judge